



Planning Inspectorate

Report to Telford and Wrekin Council

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Inspectors appointed by the Secretary of State

Date: 25 September 2026

Planning and Compulsory Purchase Act 2004 (as amended and applied by the
Levelling-up and Regeneration Act 2023 (Commencement No. 11 and Saving and
Transitional Provisions) Regulations 2026)

Report on the Examination of the Telford and Wrekin Local Plan Review

The Plan was submitted for examination on 12 September 2025

The examination hearings were held between 24 and 26 February, 3 and 5 March,
and 17 and 19 March 2026

File Ref: PINS/C3240/429/12

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Abbreviations used in this report

AM	Additional modification
BNG	Biodiversity Net Gain
GTAA	Gypsy and Traveller Accommodation Assessment
ha	hectares
HRA	Habitats Regulation Assessment
IIA	Integrated Impact Assessment
IDP	Infrastructure Delivery Plan
LNRS	Local Nature Recovery Strategy
m	metres
MM	Main modification
NHS	National Health Service
NPPF	National Planning Policy Framework
PPG	Planning Practice Guidance
SEA	Strategic Employment Area
SFRA	Strategic Flood Risk Assessment
The Council	Telford and Wrekin Council
The Plan	Telford and Wrekin Local Plan Review

Non-Technical Summary

This report concludes that the Telford and Wrekin Local Plan Review (the Plan) provides an appropriate basis for the planning of the Telford and Wrekin borough, provided that a number of main modifications (MMs) are made to it. Telford and Wrekin Council (the Council) has specifically requested that we recommend any MMs necessary to enable the Plan to be adopted.

Following the hearings, the Council prepared schedules of the proposed modifications and, where necessary, carried out sustainability appraisal as part of an updated Integrated Impact Assessment (IIA) and habitats regulations (HRA) assessment of them. The MMs were subject to public consultation over a six-week period. In some cases, we have amended their detailed wording and/or added consequential modifications where necessary. We have considered the IIA and HRA and all the representations made in response to the consultation and have recommended inclusion of the MMs in the Plan, except for MM030, for the reasons set out in the report.

The MMs can be summarised as follows:

- Moving the plan period forward by one year to 2021- 2041, with consequential amendments throughout, including to the Vision and housing requirement.
- Revising the housing trajectory to take account of the above changes and several adjustments to housing supply based on updated evidence.
- Clarifying the meaning of 'Forest Community' in the Vision and throughout.
- Amending the non-housing Strategic Policies to be consistent with national policy and to reflect updated evidence on employment land need and supply.
- Amending the Strategic Policy on developer contributions to include an effective and justified approach to viability review mechanisms.
- Aligning development management policies on climate change and the natural environment with national policy and the Plan's evidence base.
- Clarifying the allocations for Sustainable Communities for effectiveness.
- Various amendments to the other housing, mixed-use and employment allocations for clarity and to reflect updated evidence.
- Changing the affordable housing policy requirements in respect of the Telford built up area to reflect the Council's submitted viability evidence.
- Inserting a monitoring framework.
- A number of other modifications to ensure that the plan is positively prepared, justified, effective and consistent with national policy.

Introduction

1. This report contains our assessment of the Telford and Wrekin Local Plan Review (the Plan) in terms of Section 20(5) of the Planning and Compulsory Purchase Act 2004 (as amended) and as applied by Regulation 4 and paragraph 2 schedule 1 of the Levelling-up and Regeneration Act 2023 (Commencement No. 11 and Saving and Transitional Provisions) Regulations 2026. It considers whether the Plan is compliant with the relevant legal requirements (including in terms of the Town and Country Planning (Local Planning) (England) Regulations 2012, also as applied by Regulation 4 and paragraph 2 schedule 1 of the Levelling-up and Regeneration Act 2023 (Commencement No. 11 and Saving and Transitional Provisions) Regulations 2026) and whether it is sound.
2. This Plan has been prepared and examined in accordance with the National Planning Policy Framework (NPPF) 2024 and this is consistent with the implementation provisions of the version of the NPPF published in August 2026. The NPPF 2024 (paragraph 36), to which we have had regard, advises that, in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
3. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound and legally compliant plan. The Telford and Wrekin Local Plan Review Publication Version (February 2025) submitted in September 2025 is the basis for our examination. It is the same document as was published for consultation in March 2025.

Main Modifications

4. In accordance with section 20(7C) of the 2004 Act the Council requested that we should recommend any main modifications (MMs) necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. Our report explains why the recommended MMs are necessary. The MMs are referenced in bold in the report in the form **MM001**, **MM002** etc, and are set out in full in the Appendix.
5. Following the examination hearings, the Council prepared a schedule of proposed MMs and, where necessary, carried out sustainability appraisal and habitats regulations assessment of them. The MM schedule was subject to public consultation for six weeks. We have taken account of the consultation responses in coming to our conclusions in this report and in this light, we have made some amendments to the detailed wording of the main modifications and added consequential modifications where these are necessary for consistency or clarity. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal/habitats regulations assessment that has

been undertaken. Where necessary we have highlighted these amendments in the report.

Policies Map

6. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the set of plans identified as 'Telford and Wrekin Local Plan Policies Map – Borough wide' and 'Telford and Wrekin Local Plan Policies Map – Telford'.
7. The policies map is not defined in statute as a development plan document and so we do not have the power to recommend main modifications to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map.
8. These further changes to the policies map were published for consultation alongside the MMs in the 'Telford and Wrekin Local Plan Review Main Modifications June 2026'. In this report we identify the amendments that are needed to those further changes in the light of the consultation responses.
9. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in the set of plans identified above and the further changes published alongside the MMs, incorporating the necessary amendments identified in this report.

Context of the Plan

10. The Telford and Wrekin Local Plan Review is proposed to replace the Telford and Wrekin Local Plan 2011-2031 in its entirety.
11. The borough of Telford and Wrekin is located between the Birmingham/Black Country conurbation to the east, and rural Shropshire to the west. It is served by the M54 and three railway stations. Most of the unitary authority's resident population (around 180,000) lives in the new town of Telford, with smaller concentrations in the market town of Newport and in rural areas. The latter include the Weald Moors and Wrekin Forest.
12. Urban Telford has an extensive network of green and natural spaces, which emerged from the original masterplan for the new town. The Ironbridge Gorge World Heritage Site and Wrekin Hill (part of the Shropshire Hills National

Landscape) are historic and natural landmarks that attract considerable tourism. Other key economic sectors in the borough include advanced manufacturing, defence, engineering and IT, as well as agri-tech associated with Harper Adams University. Notwithstanding this, some areas of Telford are in the top ten percent most deprived nationally.

Public Sector Equality Duty

13. The Council prepared an Equality Impact Assessment as part of the Integrated Impact Assessment (IIA) of the submission Plan. We have had due regard to the aims expressed in S149(1) of the Equality Act 2010. This has included our consideration of several matters during the examination including specific policies to provide for the accommodation needs of Gypsies and Travellers; and those who require supported and specialist housing. The policies should directly benefit those with protected characteristics. In this way the disadvantages that they suffer would be minimised and their needs met in so far as they are different to those without a relevant protected characteristic. There is, also, no compelling evidence that the Plan as a whole would bear disproportionately or negatively on them or others in this category.

Assessment of Legal Compliance

14. The Plan has been prepared in accordance with the Council's Local Development Scheme.
15. Consultation on the Plan and the MMs was carried out in compliance with the Council's Statement of Community Involvement.
16. The Council carried out an IIA of the Plan, which incorporated Sustainability Appraisal. The Council prepared a report of the findings of the IIA and published the report along with the Plan and other submission documents under Regulation 19. The IIA was updated to assess the main modifications.
17. The document called 'Habitats Regulation Assessment of the Telford and Wrekin Regulation 19 Local Plan February 2025' sets out that the Plan may have some negative impact which requires mitigation and that this mitigation can be secured through the plan as modified. Therefore, in practice it is not expected there would be any adverse effect on the integrity of any habitats sites either alone or in combination with other plans or projects.
18. The Development Plan, taken as a whole, includes policies to address the strategic priorities for the development and use of land in the local planning authority's area. These are set out in the Vision Priorities and Profile section of the Plan and are: Tackling climate change and achieving carbon neutrality; protection and enhancement of the green natural and historic environment,

maximising inward investment and employment opportunities; securing better homes for all; delivering regeneration, renewal and stronger communities and; improving health, wellbeing and tackling health inequalities.

19. The Development Plan, taken as a whole, includes policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change. Tackling climate change and achieving carbon neutrality is the first of six defined priorities of the Plan and the Plan includes specific policies to support this ambition and drive climate change action. These include Policy Strategic S5 (Mitigating and adapting to climate change), Policy CC1 (Sustainable construction and carbon reduction), Policy CC2 (Renewable energy in developments) and Policy CC3 (Strategic renewable energy development).
20. The Plan complies with all other relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.

Assessment of Soundness

Main Issues

21. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings, we have identified six main issues upon which the soundness of this plan depends. This report deals with these main issues. It does not respond to every point or issue raised by representors. Nor does it refer to every policy, policy criterion or allocation in the Plan.

Issue 1 – Have the vision, priorities and development strategy been positively prepared, are they justified and consistent with national policy, and can they be realistically achieved?

The Plan Period

22. The plan period is 2020 to 2040. This would mean that on adoption the Plan would have less than 14 years of the period remaining. The NPPF seeks that strategic policies should look ahead for a minimum 15 years from adoption of a plan. Moving the plan period by one year at both start and end to 2021-2041 would, whilst still marginally short of the expectation in national policy nevertheless ensure that the Plan is positively prepared. This can be accommodated with little change or update to the evidence base and helps to ensure that the Plan can be adopted without delay.
23. **MM001** makes a number of general changes to update references to the plan period references throughout the plan and **MM002** makes a specific

consequential change to the introduction to the Plan. These modifications are necessary for the Plan to be positively prepared.

The Vision

24. The Plan sets out a Vision for the borough based on six key principles. Given that the plan period is being extended to 2041, the references in the Vision need to be changed to reflect this. Some of the wording of the Vision description also needs to be changed to recognise that some parts of the Vision will be achieved during the plan period not just at the end.
25. A fundamental part of what the Plan seeks to achieve is to embed development within an extensive tree planted landscape. This concept is cross cutting and embedded within the plan strategy and policies. This “Forest Community” has been a key part of the way in which the borough has developed and will continue to develop. The Vision needs to be strengthened and developed to reflect the importance of this Forest Community concept to the future of Telford. In addition, it is necessary for a definition of Forest Community to be added to the Glossary.
26. **MM003 and MM145** make these necessary changes for the Vision to be positively prepared and to be effective.

The Strategic Priorities

27. To support the Vision, the Plan sets out six Priorities which each have a number of supporting objectives. These provide context for the plan strategy. Each Priority also sets out a number of key policies which relate to that Priority. However, the policy references are both incomplete and inconsistent and so to be effective **MM004** is necessary to address this and also to ensure that the description of the Priorities is up to date.

The Development Strategy

28. In preparing the Plan the Council considered a number of development strategy options. These included different roles for the towns and the rural area, but through consultation and an IIA process the Council decided to maintain the strategy of the adopted plan of focussing growth in and around the edges of Telford, allowing some growth in and on the edge of Newport and allowing some housing growth in key rural settlements.
29. The Council has promoted significant economic growth in Telford which has capitalised on the town's location and transport links. The strategy in this Plan is to continue with that growth and attract inward investment. This strategy was first tested through the Regulation 18 stages and reappraised when the housing

requirements increased before Regulation 19 stage. We consider that the continuation of the existing strategy is a reasonable approach to adopt given consideration of all of the evidence including detailed consultation exercises. The housing and employment requirements have changed from the adopted plan, and we consider these elsewhere in the report, but the spatial strategy approach remains broadly the same.

30. The Council looked at a number of options for expanding Telford town. Five new broad growth areas were considered from which through detailed appraisal processes the three Sustainable Communities in the Plan were consequently selected. The other two broad areas for growth were discounted for a combination of reasons including constraints such as landscape, biodiversity, transport and deliverability. The Council's discounting of growth to the west, east and south of Telford and focussing on an expansion of the town northwards has been arrived at through detailed assessments of the evidence including the IIA. Expansion to the south is constrained by the borough boundary and the potential growth areas at Dawley Road and Redhill did not score so well on assessments looking at constraints, opportunities and deliverability, as the areas now known as the Sustainable Communities did.
31. A detailed site assessment and selection process considered potential allocations and led to the selection of sites identified in the Plan including the re-use and intensification of brownfield and town centre sites. We consider the site selection methodology to be sound
32. We consider that the strategy is positively prepared and is justified in that it is appropriate, has been arrived at by considering reasonable alternatives and is based upon proportionate evidence. We also consider that the development strategy is achievable.

Conclusion

33. Subject to the MMs identified above the Plan's vision, priorities and development strategy have been positively prepared, are justified, are consistent with national policy and can be realistically achieved.

Issue 2 – Is the approach to housing requirement and supply justified by the evidence and consistent with national policy?

Housing requirement

34. Policy S4 sets out the housing delivery strategy. It identifies a housing requirement of 20,200 dwellings (net) for the period 2020-2040. This is 1,010 dwellings per year for each year of the plan period. This was informed by the Standard Method which gives a figure of 857 dwellings per year plus a figure of 153 dwellings per year which is a contribution to the unmet need of the Black Country authorities.
35. However, the assessment needs to use the updated Standard Method figure and needs to be adjusted for the changed plan period 2021-2041. This would give a Standard Method calculation of 881 dwellings per annum.
36. The NPPF also indicates that as well as the local needs figure any needs that cannot be met in neighbouring areas should also be taken into account in determining the amount of housing to be planned for. Telford and Wrekin has a long history of a connection to the Black Country and migration from there has played a key part in the growth of the borough. Having assessed migration data the Council calculated that an appropriate figure to reflect trends would be around 126 dwellings per annum but considered that this should be increased to 153 dwellings per annum to account for support to the wider housing market area. This figure has the formal support of the Black Country authorities through statements of common ground. We consider this to be an appropriate contribution towards the unmet need of the Black Country authorities and demonstrates a housing requirement that accords with the provisions of the NPPF, and which is positively prepared.
37. Taking the two elements together for the adjusted plan period the overall housing requirement would be 20,680 dwellings for the period 2021-2041, the equivalent of 1,034 dwellings per annum. **MM005, MM006, MM007, MM008, MM015 and MM016** are necessary to amend a number of elements of the Development Strategy and the Housing Delivery Strategy as set out in the Plan including the change in the housing requirement from 20,200 dwellings to 20,680 dwellings over the plan period for the reasons set out above, and to make it clear that the 153 dwellings per annum is a contribution, not an offer, to towards meeting the unmet needs of the Black Country authorities unmet housing needs. These changes are necessary for effectiveness and to ensure that the Plan is justified and positively prepared.

Housing supply for the plan period

38. The Plan makes provision for housing supply to meet the identified requirement. This comprises of extant permissions, site allocations and a windfall allowance.

39. The Plan includes a windfall allowance of 60 dwellings per annum. However, the assessment used to assess historic windfall contributions used a site threshold of 5 dwellings, whereas it would be more appropriate for the windfall allowance assessment to be based on a site threshold of less than 10 dwellings, to be consistent with the NPPF definition of major sites being of 10 or more dwellings. This, and more up to date evidence on windfalls, provides compelling evidence that a windfall allowance of 120 dwellings per annum would be more realistic.
40. Commitments for the adjusted period 2021-2041 total 3,858 which when added to the completions from 2021/22 to 2024/25 and the windfall allowance gives a total of around 11,300 units. New allocations in the Plan are expected to deliver 10,231 units in the plan period. We deal with the allocations elsewhere in this report.
41. We consider the delivery expectations to be a reasonable assumption for the plan period given the evidence before the examination and which we assessed for each of the allocations and commitments. This provides a total supply of around 21,500 dwellings against the plan period requirement of 20,680 dwellings. We therefore consider that the Plan provides specific and developable sites for the plan.
42. **MM015, MM016 and MM139**, amongst other things, replace the housing trajectory graph in the Plan with an updated trajectory graph to show the changed housing requirement and supply position over the plan period. They also add a detailed housing trajectory table as a new appendix to the Plan and add a specific reference to the role of the three Sustainable Communities to the delivery of the housing strategy. These changes are necessary for effectiveness.

Housing supply for the five-year period following adoption

43. NPPF expects plans to identify a specific and deliverable supply of sites for the first five years following the date of adoption. Given the most up to date housing supply information before the examination, we consider that the five-year period should be calculated from 1 April 2026. We consider that the oversupply of completions from the start of the plan period can be taken account of in calculating the five-year supply requirement. This would give an annual requirement of 956 dwellings per annum for the first five years of the plan period taking account of the contribution towards the Black Country authorities unmet needs and applying a 5% buffer. Given the Council's Housing Delivery Test position, there is no need to apply a higher buffer to accord with the NPPF. This means that there is a total supply of around 5,914 dwellings against a five-year requirement of 4,781 dwellings representing a supply of 6.2 years.

44. Even if the oversupply of past completions since the start of the plan period was not taken into account there would still be around 5.4 years' housing land supply. We can therefore be confident that the Plan provides for a specific and deliverable supply of sites for the first five years following adoption.

Conclusion

45. Subject to the modifications set out above, the approach to housing requirement and supply is justified, effective and consistent with the evidence and national policy.

Issue 3 – Are the other, non-housing strategic policies positively prepared, do they reflect the priorities and development strategy, are they justified by a robust and credible evidence base, and are they effective and consistent with national policy?

Policy Strategic S1 – Protecting and enhancing the borough's green spaces

46. Policy S1 is supportive of the NPPF's objectives for green infrastructure and generally links relevant development management policies to the Plan's Forest Community vision, priorities and strategic objectives in an effective way. However, **MM009** and **MM010** add missing context for subsequent detailed policies on biodiversity, green infrastructure and trees and **MM146** inserts a definition of "Green Guarantee Sites" in the Glossary, so Plan users understand the term's local meaning and do not misinterpret it as a development plan designation. These MMs are necessary for the Plan to be effective.

Policy Strategic S2 – Nature conservation

47. This policy reflects the NPPF's overall objectives for nature conservation and recovery but makes no reference to the 'Shropshire and Telford and Wrekin Local Nature Recovery Strategy' (LNRS), which identifies and maps nature recovery priorities and actions for the area with the involvement of local organisations and partners. **MM011** and **MM012** insert a provision, with supporting text, that applicants must have regard to the latest LNRS, subject to which Policy S2 is effective and consistent with national policy and guidance on nature.

Policy Strategic S3 – Economic delivery strategy

48. Policy S3 links Priorities 3 and 5 with the detailed policies affecting the local economy. These include the development management policies specifically addressing economy and centres, as well as those with economic implications such as on communication networks, rural areas, leisure, culture and tourism.

49. The 'Employment Land Delivery Topic Paper June 2026' updates the data on employment land need and supply and demonstrates Telford and Wrekin has a strong industrial base with potential to grow. Delivery of additional employment land (broadly defined as land within use classes B2, B8 and E(g)) to at least meet identified need over the plan period is therefore a central plank of the Council's economic development strategy, and Policy S3 rightly sets this out. However, the change in plan period necessitates a slight adjustment in the employment land requirement figure to 168ha. In addition, the policy and supporting text do not accurately reflect the evidence on principal sources of employment land supply and corresponding development management policies.
50. **MM013** and **MM014** rectify these issues. This includes taking account of site allocations carried forward into the Plan from its predecessor (to which we will return under Issue 4 below); and giving an indicative breakdown in supporting text of anticipated supply by use class to assist monitoring. These MMs also insert text to explain the relationship between planned housing growth and economic development; and to acknowledge that other sectors such as tourism, town centres and the rural economy can contribute to economic development in the area. Given the area's mixed economy, these MMs are necessary for the Plan's economic delivery strategy to be justified and consistent with national policy on building a strong, competitive economy.
51. **MM144** adds a definition of "employment land" to the Glossary for clarity and therefore the effectiveness of Policy S3.

Policy Strategic S5 – Mitigating and adapting to climate change

52. This policy supports Plan Priority 1 and the Council's ambition for Telford and Wrekin to be a "climate neutral" borough. Its strategic approach is consistent with the NPPF's objectives on climate change mitigation and adaptation and is supported by detailed development management policies on climate change, and others covering aspects of the natural environment, design and sustainable transport.
53. Building Regulations are the primary mechanism for managing the energy performance of, and carbon emissions from, development. The government has confirmed that the Future Homes and Future Buildings Standards will come into force through Building Regulations, which will introduce more stringent mandatory requirements for energy performance and sustainable design. The Council clarified at the hearing sessions that its Plan policies are intended, rightly, to complement Building Regulations rather than require applicants routinely to exceed them. It wishes applicants to take a proactive and holistic approach to climate change mitigation and adaptation in the design process and to consider all Plan policies relevant to this matter alongside Building Regulations. Applicants are expected to demonstrate this through a supporting Sustainability Statement.

54. This approach is justified given the multiple and inter-related elements of development design that can influence climate change mitigation and adaptation. It is also consistent with the Council's 'Whole Plan Viability Assessment 2023' and 'Regulation 19 Viability Note December 2024' (the viability report), which has tested the cost of the emerging higher Building Regulations standards alongside the Plan's various policy requirements.
55. However, to be effective and consistent with national policy, Policy S5 and its supporting text require modification to clarify the relationship between Building Regulations, the policy and Sustainability Statements. This includes making clear how a Sustainability Statement can be used to streamline the various application requirements in development management policy (having regard to guidance where relevant), such as in relation to heating and cooling; and that a Sustainability Statement should only quantify a proposal's carbon reduction where Building Regulations standards are proposed to be exceeded.
56. **MM017** and **MM018** make these changes. That said, after considering the consultation responses and for the policy to be fully effective, we have amended **MM017** to make clear that, when required, Sustainability Statements should be commensurate with both the scale and type of development proposed.

Policy Strategic S6 – Healthy stronger communities

57. The Plan's strategic policy for healthier and stronger communities generally aligns with the NPPF and is supported by development management policies covering community facilities, active travel and hot food takeaways, among others. It is also underpinned by evidence in the 'Infrastructure Delivery Plan' (IDP) on the future health and wellbeing infrastructure needed to support new development. For the policy to be fully effective, however, relevant stakeholders need to be engaged through the development management process. The additional supporting text in **MM019** is therefore necessary for Policy S6 to be sound. In addition, **MM020** is necessary for effectiveness, to make clear the policy's expectations on health and wellbeing will be applied where relevant.

Policy Strategic S7 – Developer contributions and infrastructure delivery

58. Policy Strategic S7 sets out the approach to developer contributions and infrastructure delivery. The provisions of the policy which relate to the review of development on completion are not justified nor effective. The wording of the relevant part of the policy needs to be amended such that it is clearer how the review mechanism would operate and on what basis. It needs to specify the thresholds to which the mechanism would apply.
59. On the basis of the evidence put to us, including the suggestion by the Council at the hearings, we consider that that the provision should apply to major

development on completion (and for schemes of more than 500 units on completion of 75% of the units) and that a viability review should refer to a policy compliant or capped financial contribution whichever is the lowest. This gives certainty to developers and makes the policy effective and justified. A number of other wording changes are necessary for effectiveness and all changes to policy wording are made by **MM021**.

60. **MM022** makes consequential changes to the supporting text to outline how the review mechanism would operate and **MM134** updates the list of policies which would be used to secure developer contributions, both modifications being necessary for effectiveness.

List of strategic policies in appendices

61. Appendix G of the Plan lists the strategic policies and identifies how they have changed compared to the previous plan. That was a helpful guide for consultation but is now superfluous and **MM135** removes it for effectiveness.

Conclusion

62. Subject to the MMs identified above, the non-housing strategic policies reflect the priorities and development strategy and are positively prepared, justified, effective and consistent with national policy.

Issue 4 – Are the allocations and their requirements, including those for Sustainable Communities, justified, effective, and consistent with national policy?

Sustainable Communities

63. Policy HO2 allocates the three Sustainable Communities and sets out detailed policy wording for each of them.
64. The Sustainable Communities are urban extensions to the north of Telford and are important components of both the spatial strategy and housing delivery strategy for the Plan as referred to elsewhere in our report. The delivery of these three sites is critical to the future of the borough.
65. Together the Sustainable Communities account for a supply of nearly 8,000 new homes, close to 7,000 of which are expected to be delivered within the plan period. Each Sustainable Community will also provide employment to varying degrees along with new local centres and supporting infrastructure. They have been selected following the IIA and a detailed site selection process.

66. Significant progress has been made in the pre-planning work between the Council and developers/promoters although we consider that there needs to be greater community involvement in the design and detailed shaping of the sites, and we recommend modifications which include this. Although each site is at different stages, we see no evidence of potential impediment to them being brought forward and delivered within the envisaged timescales.
67. The allocation of the three Sustainable Communities accords with the development strategy of the Plan and represents the logical extension of Telford northwards. The principle of the allocations is sound.

Policy HO2 Sustainable Communities

68. Policy HO2 is a single policy which allocates and sets out requirements for each of the three Sustainable Communities. There are common requirements set out in the policy for each of the sites but also specific ones for each setting out a vision for each one and delivery expectations. However, the policy needs to be modified to make it clear that there is a common requirement that a Design Brief and Masterplan must be submitted for each Sustainable Community early in the planning process, be informed by public consultation carried out in line with the approach set out in the Statement of Community Involvement and be approved before the first grant of planning permission. To be effective a definition of Design Brief and Masterplan needs to be added to the appendix and **MM142** achieves this.
69. **MM067** is necessary for effectiveness to set out these general requirements and to provide clarification that the three Sustainable Communities will be considered as part of the urban area of Telford for decision making purposes.
70. The Sustainable Communities are not listed in the appendices unlike the other allocations. To address this inconsistency and for effectiveness **MM133** introduces a new appendix listing the three Sustainable Communities, their estimated housing numbers and employment land take and uses.

SC1 Land at Bratton

71. This Sustainable Community would comprise around 2,100 dwellings, 2ha of employment land and a new local centre. Whilst from the evidence presented to us SC1 is the Sustainable Community that has the potential to commence on site first, we consider that this will not be as early as the Council had anticipated. Nonetheless, we consider that there is a reasonable prospect of it delivering homes within 5 years of adoption of the Plan and that the site could be completed within the plan period.

72. The vision section of the policy needs to make stronger reference to the need for the development to be delivered in line with the Local Plan vision for Telford as a Forest Community and to set out what that means. This is a common change needed across all three Sustainable Communities visions. The vision for SC1 also needs to be clearer in terms of its expectations for onsite facilities including a primary school and local centre and how the site should be connected to the existing community.
73. The delivery section of the policy needs to make stronger, more detailed and clearer references to matters such as: infrastructure requirements, phasing, design, landscaping, green infrastructure, flood mitigation, heritage assets protection, access arrangements, open space provision and delivery mechanisms.
74. These modifications are necessary for the policy to be effective and **MM068** sets them out.

SC2 Land North East of Muxton

75. This Sustainable Community would comprise around 2,700 dwellings with nearly all units to be delivered in the plan period and around 5.6 ha of employment land and new local centres. From the evidence presented to us we consider that the site would start delivering homes in year 5 from adoption of the plan.
76. As with other the sections relating to the other Sustainable Communities, the vision section of the policy needs to make stronger references to the need for the development to be delivered in line with the Local Plan vision for Telford as a Forest Community and to set out what that means. The vision for SC2 also needs to be clearer in terms of its expectations for onsite facilities including two new primary schools, the principles of the proposed employment area including the expected use classes, and how the site should be connected to the existing community by public transport and cycle links. The evidence from the consultation responses on the modifications indicates that the site might be required to deliver two or three local centres and therefore to be effective it is necessary for this to be added to the vision for site.
77. The delivery section of the policy for SC2 needs to make stronger, more detailed and clearer references to matters such as: infrastructure requirements, phasing, landscaping, green infrastructure, design, access arrangements, flood mitigation, open space provision and delivery mechanisms.
78. The bulk of the allocation lies to the north west of Muxton rather than the north east, and therefore it is necessary for effectiveness for the name of the site to be changed accordingly to Land North West of Muxton. This change will result

in a number of consequential changes where the site is referenced elsewhere in the Plan including in the title of the site plan. There will also be a consequential change in respect of the policies map.

79. These modifications are necessary for the policy to be effective and **MM069** sets them out.

SC3 Land North of A442 Wheat Leasows

80. This Sustainable Community site is expected to deliver around 3,100 new homes with around 2,190 to be delivered in the plan period. It is also expected to deliver around 68ha of employment land and two new local centres. On the evidence before us, we consider that there is a reasonable prospect of houses starting to be delivered in year 5 following adoption of the plan.
81. As with the other the sections relating to the other Sustainable Communities, the vision section of the policy needs to make stronger references to the need for the development to delivered in line with the Local Plan vision for Telford as a Forest Community and to set out what that means. The vision for SC3 also needs to be clearer in terms of its expectations for onsite facilities including new schools, two local centres, open space, the principles of the proposed employment area, and how the site should be connected to the existing community by public transport and cycle links. It is also clear that the site has potential for tourism activity given the restoration of the Shrewsbury and Newport Canal at adjacent Wappenshall Wharf and reference to this should be added to the vision section to be consistent with Policy CI4 of the Plan.
82. The delivery section of the policy for SC3 needs to make stronger, more detailed and clearer references to matters such as: infrastructure requirements, phasing, landscaping, green infrastructure, design, access arrangements including a restriction on vehicular access from Wellington Road and encouraging the use of existing accesses for pedestrians and cyclists only, flood mitigation, drainage asset retention, heritage asset protection, open space provision and key delivery mechanisms. There is also a justified need for a reference to secure a suitable buffer to protect the character of existing adjacent communities, in particular those of Eyton Upon the Weald Moors and Wappenshall Wharf.
83. These modifications are necessary for the policy to be effective and **MM070** sets them out.

Housing allocations

84. Policy HO1 allocates a number of housing sites. The housing allocations are listed in Table 7 in Appendix A. The estimated housing number for each

allocation is included in the table. The Sustainable Communities are not included in the list and so to be effective, the wording of the introductory text, policy and supporting text of Policy HO1 needs to be modified, through **MM0064**, **MM0065** and **MM0066** to make this clear. None of the housing allocations in Policy HO1 have any site-specific policy requirements and we are satisfied that this is an effective approach given how the policies of the plan as a whole will be applied to proposals for each site.

85. Out of the 35 housing allocations listed in Table 7, one site HO26 Land South of Old Vicarage is not justified as an allocation due to issues around unresolved ball strike concerns from Sport England relating to the adjacent cricket club. On the basis of the evidence before us, and as detailed below, we consider all of the other 34 housing allocations are justified and sound.
86. We heard considerable evidence at the hearings in relation to two proposed housing allocations on the edge of Newport, HO3 Land South of the Dale, Church Aston and HO18 Old Railway Line, Church Aston. However, we consider both of these allocations to be well located in relation to the existing settlement and that the level of growth proposed in total is consistent with the development strategy for Newport. The evidence does not indicate that the sites are subject to unresolvable technical constraints. They are deliverable. In the case of HO3 the Council has now resolved to grant planning permission.
87. The evidence indicates that the estimated dwelling numbers on some sites in Table 7 of the Plan are not realistic or achievable. Some changes required are relatively minor based on new information about capacity or estimated likely numbers associated with an emerging scheme. Some though are more significant. Evidence indicates that HO4 the Former Phoenix School on Manor Road, can accommodate around 207 dwellings as opposed to the 128 in Table 7, that HO28 Land south and west of Somerfield Road, can accommodate significantly more than the 15 indicated but delivery would be at the back end of the plan period given that the site is an active quarry and would need significant groundwork. HO23 Land southern side of Waters Upton, can accommodate around 40 dwellings as opposed to 26 in the Table.
88. At the hearings the promoters of HO24 Land at the junction of Hay Street Tibberton indicated that due to access constraints it was no longer realistic to assume that the site could accommodate the estimated 25 dwellings. We consider that a more reasonable estimated figure of 7 dwellings is justified based on evidence submitted by the Council. An expansion of the site boundaries is not justified and having established the principle of development through the allocation it is up to the developer to work with the Council and statutory bodies to design and finalise an appropriate and acceptable scheme for the site including the final number of houses, through the planning application process.

89. All of the estimated housing numbers are however simply that, and they may change during the plan period as updated information comes forward and schemes are worked up. Policy HO1 does not cap numbers nor set them out as minimum. Whilst the modification alters the estimated housing numbers column in Table 7 it does not alter site boundaries.
90. At the modifications consultation stage, objections were made by local residents to two housing allocations set out in the revised table in **MM130**. The sites concerned, are HO5 Land North of Allscott Meads and HO15 Land West of Allscott Meads. Having looked at the evidence before us we consider these allocations to be soundly based and justified. The evidence indicates that there are no technical constraints that could not be overcome and housing development would support the defined rural settlement of Allscott. Many of the representations on these two allocations relate to detailed matters and these can be addressed through the planning application process in due course.
91. There is a need to add an additional housing allocation, which is set out in the adopted plan but which needs to be carried over to this Plan as it will replace the adopted Telford and Wrekin Local Plan in its entirety. This site is HA35 which is Lawley West and is expected to deliver around 250 dwellings. It has outline planning permission and a reserved matters application is in preparation. It is justified as an allocation and there is reasonable prospect that it can start delivering houses within five years of adoption of the plan. A consequential change to the policies map will need to be made.
92. In order to be effective, it is necessary to amend the reference to each housing allocation from HO to HA thereby avoiding any confusion with policy numbering for the housing policies in the Plan.
93. All of these changes to Table 7 are necessary to ensure that the housing allocations are justified and effective and are made through **MM130**.

Mixed-use allocations

94. These are listed in Table 9 in Appendix C. Information about estimated housing numbers and the anticipated quantum of commercial/town centre development is included for each site. However, it is not clear which planning use classes would be supported in each case, or how decision-makers would be expected to respond to proposals that vary from those listed. This information should be added for effectiveness, along with guidance on how to obtain site-specific advice given the allocations themselves do not include these details. Main town centre uses are defined in the NPPF and Glossary of the Plan.
95. Sites MU1 to MU7 are located within Telford Town Centre and all have potential for both residential and commercial development. This includes the site at

Telford Station (MU7), which the Council has confirmed has capacity for about 100 homes in addition to Class E uses. This needs to be added to the estimated housing numbers column in Table 9. The approximate unit numbers for Land off Ironmasters Way (MU1) and Land at Southwater Phase 2 (MU4) also require amendment to reflect the housing supply position set out in the updated Housing Delivery Topic Paper and Master-sheet of June 2026.

96. At the hearing on this issue, the Council said allocation of the site known as Mere Park (MU8) for mixed use is no longer justified, as planning permission for a residential care home on the site has been granted on appeal. We see no reason to disagree. In the case of the site known as Wheat Leasows (MU9), there is nothing in the retail evidence before us to justify allocating this out of centre site for main town centre uses, but employment uses are justified, particularly given the site's proximity to a Strategic Employment Area (SEA). Consequently, Wheat Leasows should be allocated for employment rather than mixed use. Both MU8 and MU9 therefore need to be deleted from Table 9, with consequential changes to the policies map.
97. **MM132** makes the above amendments to Appendix C, subject to which the mixed-use allocations are justified and effective.

Employment allocations

98. These are listed in Table 8 in Appendix B. As above, for clarity and thus effectiveness the table should include the use classes that would be supported on each site, and that applicants should be advised to seek pre-application advice regarding site-specific details. The table also needs to make clear that the quantum of "employment" estimated in each case relates to employment land in hectares rather than any other interpretation of that word. Some of these allocations are rightly also designated as Strategic Employment Areas (SEA) (as listed in new Appendix G inserted via **MM136** and shown on the policies map) because, once developed, they will make a significant contribution towards meeting the identified need for employment land and need to be protected accordingly.
99. Table 8 does not include the eight "carried forward" allocations noted under Policy Strategic S3 above. These are nevertheless referred to in the Plan at paragraph 8.10 and shown on the policies map that underwent consultation alongside it. They were also considered within the IIA. On this basis, we are satisfied the spatial strategy and appraisal of reasonable alternatives took account of these existing allocations, and that there was an opportunity for interested parties to comment on their inclusion in the Plan. However, for the Plan to have a consistent and therefore effective approach to allocations, they should be listed alongside the new employment sites in Table 8, Appendix B.

100. The site known as Wheat Leasows (MU9) also needs to be added to Table 8 for the reasons explained under mixed use allocations above. Conversely, Land at Madeley Court Way (reference EC6) should be deleted. This is because it is a small site within a town centre boundary and evidence in the relevant site assessment sheet recommends its development for town centre uses rather than those falling within the definition of employment land. Development of this type and scale can be adequately managed by the detailed policies for town centre uses, so a site-specific allocation for that site is not justified.
101. **MM131** makes the above changes to provide a justified and effective list of employment allocations, with appropriate explanatory text. It also renumbers the sites to remove unnecessary differentiation between new and existing allocations. Consequential changes to the policies map are also needed.

Conclusion

102. Subject to the MMs identified above, the allocations and their requirements, including those for Sustainable Communities, are justified, effective and consistent with national policy.

Issue 5 – Are the development management policies positively prepared, justified, effective, and consistent with national policy?

103. The Plan contains development management policies that collectively seek to set out the requirements for and manage impacts from development. These include policies relating to climate change; green and natural environment; economy and centres; housing; development design; sustainable travel and transport networks; community infrastructure, culture and open space; historic environment; and minerals and land. As noted under Issue 2, these detailed policies generally align with the Plan's vision, priorities and strategic policies and with the relevant objectives in national policy.
104. Policies NE6, EC5, EC7, EC8, EC10, HO6, HO7, HO9, DD3, DD4, DD5, DD6, ST2, CI2, CI5, HE3 and HE5 and the corresponding supporting text are sound without MMs. However, we have soundness concerns with the remaining development management policies, as set out below.

Policy CC1 – Sustainable construction and carbon reduction

105. To align with Policy S5 and the viability evidence discussed above, **MM023**, **MM024** and **MM025** are necessary to make clear that Policy CC1's provisions complement the standards required by Building Regulations rather than expecting applicants routinely to exceed them; that they will apply only where relevant and practicable; to cross-refer to Policy S5 in relation to Sustainability Statements; and to remove unjustified references to viability testing where requirements cannot be met. **MM024** also removes unnecessary duplication

with Policy CC2 in relation to renewable energy. Subject to these MMs, Policy CC1 is justified, effective and consistent with national policy.

Policy CC2 – Renewable energy in developments

106. Policy CC2 requires all new development to incorporate renewable energy production and storage on site unless existing local renewable energy sources are available to power the site. This is an onerous provision for which there is no pertinent local justification, and which does not appear to have been tested across all development typologies in the viability report. As regards policy on installation of district heat networks, this was considered but not recommended as a matter of course in the viability evidence.

107. These requirements in parts 1 and 2 of the policy and in supporting text therefore need to be replaced by less restrictive wording. Part 3 on micro-generation should be similarly modified, and parts 5 to 6 and associated supporting text should be deleted because they unnecessarily duplicate the text on heating and cooling strategies added through modifications under Policy S5. **MM026** and **MM027** make these changes, subject to which Policy CC2 is justified, effective and consistent with national policy.

Policy CC3 – Strategic renewable energy development

108. This policy includes safeguards against significant adverse impacts on a range of factors including landscape and heritage. However, to be fully consistent with national policy, **MM028** is necessary to ensure heritage assets and their settings are considered.

Policy CC4 – Water re-use, conservation, efficiency and quality

109. Policy CC4 is supported by evidence in a comprehensive 'Water Cycle Study', which notes Telford and Wrekin was classified by the Environment Agency as an area under serious water stress in 2021 and therefore recommends adoption of the optional higher Building Regulations standard for water efficiency for new housing. That standard is currently 110 litres/person/day (l/p/d), which is reflected in the policy. However, the Government is reviewing the optional water efficiency standard with the potential of tightening it further through an update to Building Regulations Part G. We therefore considered the inclusion of this emerging standard in the Plan.

110. Notwithstanding the involvement of the Future Homes Hub in the review, given the timetable for and outcome of any change to Building Regulations Part G on water efficiency are not yet known, specifying an emerging standard would be neither justified nor consistent with PPG on water efficiency. Therefore, **MM030**, as consulted on, proposed instead to amend the policy to require compliance with the optional technical standard in force at the time an application is

submitted. However, as pointed out in the responses to the consultation on MM030, whilst the viability report considered the current optional standard of 110 l/p/d, it did not test the impact on development viability of a potentially more stringent and yet unknown future standard. Therefore, we have concluded that, on reflection, this suggested change would not be appropriate and that in this particular respect the policy is sound as submitted for examination. Consequently, we do not include MM030 in our recommendations.

111. However, **MM029** amends the policy's introductory paragraph, to refer to the area's water stress classification. **MM031** inserts supporting text to give examples of water efficiency measures; clarify the assessment required to demonstrate mitigation of impacts on water quality in designated Source Protection Zones; encourage early engagement with Severn Trent Water on water supply and wastewater infrastructure; and alert applicants to the Environment Agency's technical guidance on groundwater protection. These additions are necessary for Policy CC4 to be fully effective and to make clear the justification for including the optional technical standard. However, to be consistent with our finding above, we have removed from **MM031** any reference to an emerging higher standard.

Policy CC5 – Flood risk management and sustainable drainage systems

112. Policy CC5 is justified by an up-to-date Strategic Flood Risk Assessment (SFRA) but reference to this key information source is absent from the policy and supporting text, which is unhelpful to Plan users. Consequently, a reference should be inserted for effectiveness. In addition, to be fully consistent with PPG on flood risk, the Plan should set out local criteria for assessing whether wider sustainability benefits to the community outweigh flood risk in circumstances in which the exception test in national policy applies.
113. In part 1b of the policy, the words "now or in the future" are not justified by the evidence and introduce ambiguity for decision makers so require deletion for effectiveness. Part 1 also needs two additional criteria: firstly, to ensure proposals investigate the capacity of existing drainage assets and, bearing in mind the MM consultation responses, to allow for any adverse effects to be appropriately mitigated; and secondly, to explore opportunities to de-culvert watercourses where possible. These additions are necessary to fully reflect the recommendations of the SFRA and Strine Internal Drainage Board, and therefore for the policy to be effective. Finally, the reference in part 2b to a handbook on sustainable drainage should be reworded so this guidance is not elevated to the status of development plan policy.
114. **MM032**, as amended following consultation to refer to potential for mitigation, and **MM033** make the changes above, subject to which the policy and supporting text are justified, effective and consistent with national policy.

Policy CC6 – Managing air quality

115. Policy CC6 is generally consistent with the NPPF on air quality and applies to all relevant development proposals, so does not need to name specific sites. However, in part 1b on mitigation measures, references to health and wildlife sites are not clear enough to be fully effective, so **MM034** is necessary to rectify this.

Policy NE1 – Biodiversity and geodiversity

116. This policy's approach to mitigation of adverse impacts on biodiversity and geodiversity is broadly consistent with section 15 the NPPF but some of the wording is ambiguous or unexplained. **MM035** and **MM036** replace the reference to "the Lawton principles" by a description of the relevant objectives; clarify industry standards and guidance for ecological surveys; explain in supporting text how to interpret the term "appropriate buffer zones"; and remove Green Guarantee Sites from the table of biodiversity and geodiversity designations because, as noted above, they have no status in Plan policy. Subject to these MMs, the policy is effective.

Policy NE2 – Trees, hedgerows and woodlands

117. Part 2 of this policy lists actions expected of applicants, but the words "where relevant" need to be inserted in the preliminary sentence to ensure these are applied proportionately. For the same reason, Part 2a should make clear impacts only need to be assessed on trees, hedgerows and woodland that are within or adjacent to the proposed development site. The requirement for a mix of native and non-native trees in part 2c is justified by the evidence, but the prescriptive 50:50 ratio is not, so that element should be deleted. Part 2f includes a confusing reference to Biodiversity Net Gain (BNG), which is covered separately in Policy NE3 and the statutory BNG framework (see further explanation under Policy NE3 below), and is therefore superfluous.
118. Part 4 addresses development proposals affecting ancient woodland and/or irreplaceable habitats, but the wording is not fully consistent with NPPF paragraph 193c). "Where relevant" should be inserted here too, as the provisions will only be relevant to circumstances where offsite planting is justified. The considerations relevant to removal of mature tree specimens in reasonable condition need to be explained for the policy to be effective in these circumstances. Finally, as tree plantations managed on a commercial basis will generally undergo regular tree felling, the list of circumstances in supporting paragraph 7.12 should be extended to include this.
119. **MM037** and **MM038** make the changes identified above, subject to which Policy NE2 is justified, effective and consistent with national policy.

Policy NE3 – Biodiversity Net Gain

120. In England, under a statutory framework introduced through the Environment Act 2021, development is required to deliver at least 10% BNG, subject to some exemptions. This is measured according to a nationally prescribed metric and can be achieved through on-site biodiversity gains, registered off-site gains or statutory biodiversity credits, determined through application of a statutory Biodiversity Gain Hierarchy. Information requirements for planning applications are prescribed, and every relevant grant of planning permission is deemed to be subject to the statutory biodiversity gain condition.
121. PPG states local plans do not need to duplicate the detailed provisions of this statutory framework; and it is inappropriate to include policies which are incompatible with it, such as by applying BNG to exempt categories of development or encouraging the use of a different biodiversity metric or biodiversity gain hierarchy. In addition, plan-makers should not seek more than 10% BNG unless justified. As well as evidence of local need and opportunity for a higher percentage, justification for such policies will need to assess the impact on viability for development. Local plan policies can, however, complement the statutory framework by setting local preferences for off-site provision of BNG, for example.
122. The Biodiversity Gain (Town and Country Planning) (Amendments and Transitional Provisions) (England) Regulations 2026 came into force on 6 August 2026 and change the exemptions for BNG provision in several categories of development. They also modify the Biodiversity Gain Hierarchy for minor development, so that minor developments which remain subject to BNG can choose to go straight to off-site gains in the first instance. We have had regard to these regulatory changes in our conclusions below.
123. Policy NE3 deviates from the statutory framework for BNG and associated PPG in several ways. By stating all new development should deliver BNG, the policy inappropriately brings exempt categories of development within scope of its requirements. This is reinforced by the wording in part 2 of the policy, which supports measurable net gains in biodiversity in developments not legally required to provide them. Part 1 also relies on a different mitigation hierarchy for off-site contributions from the Biodiversity Gain Hierarchy, and parts 4 and 5 and several paragraphs of supporting text unnecessarily duplicate statutory provisions.
124. In addition, the policy requires major development proposals to exceed 10% BNG, subject to viability. However, the viability report relies on one high-level study from another county, with no published data pertinent to Telford and Wrekin. It is also unclear whether the cost of land for BNG beyond 10% has been factored in. Consequently, we are not persuaded the costs assumed in the viability report for BNG beyond 10% are realistic, or that the impact of up to 20%

BNG would be as limited as the Council suggests. Moreover, the provision for case-by-case viability assessment is not consistent with national policy on viability, which prioritises deliverable policy requirements over routine viability assessment at the decision-making stage.

125. Nonetheless, given the vision for a Forest Community, we consider that it is justified for the policy to set out an aim, rather than a requirement, for major schemes to exceed 10% BNG. The policy wording requires amendment to reflect this, and in the supporting text reference to submission of a viability report should be replaced by provision of a reasonable justification. In addition, having considered the supporting text wording further following the MM consultation, we find the first sentence of supporting paragraph 7.17 needs to state more clearly that it is achieving more than 10% BNG which may be difficult for some developments. We have amended the wording of **MM041** accordingly.
126. **MM039**, **MM040** and **MM041** are therefore necessary to: make the above changes; delete the parts of the policy and supporting text that duplicate and/or are inconsistent with the statutory framework; align wording with the provisions in national guidance and eliminate ambiguity; clarify the role of the LNRS in informing on- and off-site BNG provision; and encourage applicants to consider BNG early in the design process and seek pre-application advice. Subject to these changes, Policy NE3 is justified, effective and consistent with national policy.

Policy NE4 – Development greening factor

127. Policy NE4 applies a greening factor to major development proposals with the objective of optimising green infrastructure in the borough. The tool applies a weighting to different surface cover types to incentivise those most valuable for green infrastructure, resulting in a score between 0 and 1. The 'Green Space Factor Study 2023' explains this in the context of Natural England's Green Infrastructure Framework, which aims to improve the quality, quantity, accessibility and connectivity of green infrastructure for the benefit of wildlife, climate change resilience and well-being. These are also objectives in the NPPF.
128. We are therefore satisfied the overall objective of Policy NE4 is justified and consistent with national policy and aligned with the Plan's Forest Community vision. However, the target scores specified (0.4 and 0.3 for residential and non-residential respectively) are derived from analysis of just ten planning permissions in the area, several of which do not appear to have achieved the greening factor that would be sought under the policy. This evidence is not compelling enough to justify framing the scores as targets to be met in every case. Instead, the scores should be expressed as an aim for proposals in both categories of development. The "subject to viability" clause in part 1 also needs

to be deleted because it is neither justified nor consistent with national policy on viability.

129. Part 4 of the policy allows for off-site provision where the greening factor cannot be met on-site, with the implication that it could be entirely provided elsewhere. This is not fully consistent with the intention of the tool, which is to improve the extent and quality of green infrastructure within developments, according to the Green Space Factor Study. For this element of the policy to be justified and effective, it should require the greening factor to be met as far as possible on site, with any shortfall provided off-site but as close as possible nearby, having regard to relevant guidance such as the LNRS.
130. **MM043** makes the above changes for the policy to be justified, effective and consistent with national policy. In addition, **MM042** and **MM044** clarify the principle of the greening factor and the calculation tools to be made available to applicants, based on the existing Natural England Green Infrastructure Framework; and explain that other statutory and Plan requirements such as BNG, open space and sustainable drainage are not separate and can contribute to a proposal's greening factor score. These supporting text changes are necessary for effectiveness.

Policy NE5 - Green Network

131. This policy protects the Green Network, which is an interconnected network of open spaces within the urban areas of Telford and Newport. The extent of the Green Network has been updated in the Plan, following an assessment based on five principles, explained in the 'Green Network Topic Paper. We are satisfied with this justification. However, the term Green Network should be defined in the Glossary of the Plan for clarity and therefore effectiveness, as set out in **MM147**.
132. Part 3 of the policy expects development proposals to be assessed and justified against the five principles described in the Topic Paper, with the implication that this will be required for all applications. This is neither proportionate nor justified by the evidence and needs to be modified to make clear such an assessment would be expected only of proposals with adverse effects on the Green Network. **MM045** achieves this. In addition, **MM046** inserts an explanatory table in the supporting text to help Plan users understand how the Green Network principles interact with other relevant policies, necessary for the Plan overall to be effective.

Policy NE7 – Strategic Green Gaps

133. The Plan defines two strategic green gaps which have the purpose of preventing the coalescence of the villages of Lilleshall and Wrockwardine with Telford. Policy NE7 sets out the policy approach to development within the

gaps. The policy and the identification of these gaps are justified in that they are narrow gaps between self-contained villages which would otherwise be in danger of coalescing and significantly harming the character and appearance of the area. We do not consider that there is a justified case to identify a further Strategic Green Gap to separate Eyton on the Weald Moors from Telford. Nonetheless we recognise the need to create an appropriate landscaped buffer between that village and the Sustainable Communities in order to help protect its character, and we recommend a modification to Policy HO2 to address that, and to which we have already referenced in this report.

134. There is a need for clarification to the supporting text to Policy NE7 as to how the policy would operate and this clarification is made, for effectiveness, by **MM047**. This includes the need to make it clear in the supporting text which are the two Strategic Green Gaps as this is not specified and for effectiveness is necessary. Whilst this was not consulted on as part of **MM047** we consider this would not materially alter the intention of the policy.

Policies EC1 and EC2 – Employment/economic development in the urban area and SEAs

135. According to their titles, Policies EC1 and EC2 deal respectively with employment development in the urban area and SEAs, and economic development in the urban area. Policy for urban areas (outside SEAs) is therefore split between the two policies, with Policy EC2 dealing only with the proposed loss of employment uses in such locations. Moreover, the two policies share much of their supporting text, but it is unclear which paragraphs relate to which policy. These issues result in considerable ambiguity for Plan users.
136. For clarity and effectiveness, the policies and their supporting text require significant reorganisation, so that Policy EC1 deals primarily with development within SEAs and is clear which types of use will be supported within them; and Policy EC2 addresses proposals for, and loss of, employment uses in the urban area. The title of Policy EC1 and introductory paragraphs to both policies should also be amended to reflect this.
137. In addition, Policy EC1 and its supporting text require further amendments for clarity and effectiveness. Introductory paragraph 8.6 explains SEAs but would be clearer with the addition of a full list in an appendix. Reference to allocations carried forward should be deleted from part 1a for the reasons explained under Policy S3 above. The definition of employment uses in supporting text also needs to be explicit that only sub-class (g) of use class E is included along with B2 and B8 uses. This is because other uses in class E fall within the definition of main town centre uses, which are not supported in out of centre locations including SEAs. Although part 1 of the policy addresses this issue, the supporting text should alert Plan users to the use of conditions as the mechanism of control.

138. Furthermore, Policy EC1 is insufficiently clear in its approach to proposals that could adversely affect the day-to-day operation of existing uses and the SEA, both during construction and once operational. An additional criterion is therefore needed to address this. This is particularly relevant to operational defence and security uses associated with Ministry of Defence facilities at Donnington, which can be *sui generis* uses. Given their strategic importance, and to avoid ambiguity, the policy should express specific support for this type of use within SEAs, with further explanation in the supporting text.
139. **MM048**, **MM049** and **MM050** make the above changes to Policy EC1 and its introductory/supporting text and **MM136** adds the list of SEAs in an appendix. These MMs are necessary for effectiveness. For additional clarity, we have amended **MM050** following the MM consultation to change the unnecessarily narrow term “military operation” to “defence interests” and to include operational defence and security as an example of an appropriate *sui generis* use.
140. **MM051** and **MM052** reorganise Policy EC2 and its supporting text as described above. **MM052** also clarifies the minimum marketing period and requirements where loss of employment land outside SEAs is proposed. These MMs are necessary for Policy EC2 to be justified and effective.

Policy EC3 – Employment in the rural area

141. This policy sets out the approach to supporting a prosperous rural economy as required in national policy. The extent of the rural area to which it applies is shown on the policies map, so there is no need to explain this in the Plan. However, the policy's title describes its scope as “Employment in the rural area”, which is misleading because, as explained in the supporting text, the policy is concerned with more than jobs and/or the narrow range of uses defined elsewhere in the Plan as “employment uses”. Other references to “employment development” in some parts of the policy wording and supporting text have a similarly confusing effect. This ambiguity undermines the effectiveness of the policy, as Plan users may overlook it in some relevant circumstances.
142. Modifications to the policy title, wording and supporting text are therefore necessary to make clear the policy is concerned more broadly with economic development in the rural area; and that this includes the full range of business-related uses, activities and infrastructure envisaged in NPPF paragraphs 88 and 89. In addition, for the Plan to be consistent with national policy on best and most versatile agricultural land, the policy's supporting text needs to acknowledge the economic benefits of such land and how these will be taken into account.
143. The Plan acknowledges the importance of Harper Adams University as a major employer in the rural area, and that its world-leading education and research in agriculture, sustainable food production and agri-tech support rural economic

development in the borough. However, the application of Policy EC3 to development within the University's rural campus is not fully clear. An addition to supporting text to explain this will make the policy effective in this regard.

144. **MM053**, **MM054** and **MM055** make the changes described above for the policy and its supporting text to be effective and consistent with national policy.

Policy EC4 – Waste management facilities

145. This policy sets criteria against which to assess applications for and affecting waste management facilities and is supported by the 'Waste Study Update 2024'. The policy's provisions are generally consistent with National Planning Policy for Waste. However, we have four soundness concerns.
146. Firstly, for an applicant to demonstrate that waste management capacity is no longer required, the expectations in part 1b and paragraph 8.24 need further explanation to be effective. This is particularly important for strategic waste management facilities of sub-regional importance, to ensure all relevant stakeholders are consulted. Additional supporting text should be added to rectify this. Secondly, the requirement in part 1c for new or altered facilities to create new employment opportunities is not justified by the evidence and requires modification to make clear that, to be acceptable, such development could alternatively support and/or improve existing employment opportunities.
147. Thirdly, the wording of part 3 regarding development proposals in the vicinity of an existing waste site is too onerous to be effective. Instead of demonstrating no conflict, proposals should be required to assess potential impacts and provide any necessary mitigation in accordance with the 'agent of change' principle enshrined in the NPPF. Finally, for clarity and effectiveness, additional supporting text is needed to explain that applications for sites within 800m of a waste water treatment works may require an odour assessment.
148. **MM056**, **MM057** and **MM058** modify Policy EC4 and its supporting text accordingly. Subject to these changes, the policy is justified, effective and consistent with national policy and provides a sound basis for assessing relevant applications, with no need to name individual sites.

Policy EC6 – Telford Town Centre

149. Policy EC6 manages development within Telford Town Centre, to support its ongoing vitality and viability in accordance with national policy. No changes to the town centre boundary are proposed and we are satisfied this remains justified and rightly includes both the Town Park, which is closely connected to the primary shopping area, and land allocated for mixed use development. We also find that differentiation of a secondary frontage within the primary shopping

is justified to manage an existing cluster of *sui generis* uses and is consistent with PPG which allows for this. However, the reference to “Primary Centre Area” in the key to the policies map needs to be changed to primary shopping area, for clarity and consistency with the Plan and the NPPF.

150. Whilst part 1a of Policy EC6 rightly supports diversification of activities and services that complement main town centre uses, a direct reference to use class E is needed to remove ambiguity.
151. In part 1b, the terms “high-tech” and “gateway” are undefined, which undermines the policy’s effectiveness. Clarification, with examples, should be added in supporting text. In part 4, there is no compelling justification for only supporting residential development in the town centre where it is part of “a major, comprehensive development”, so long as a proposal is appropriate to its location and satisfies other relevant policy requirements. The requirement for “multi-generational” town centre living also lacks clear justification. Those provisions should therefore be deleted from parts 4a and 4b of the policy.
152. **MM059** and **MM060** make the changes above, subject to which Policy EC6 is justified and effective.

Policy EC9 – Out of centre and edge of centre development

153. This policy rightly directs main town centre uses in the first instance towards locations within centres in the borough’s retail hierarchy. In so doing, it makes appropriate reference to the sequential test in section 7 of the NPPF.
154. The policy includes locally set floorspace thresholds for submission of an impact assessment, where retail and/or leisure uses are proposed and a suitable site cannot be identified through the sequential test. The thresholds are recommended in the ‘Retail & Leisure Capacity Study and Health Check Final Report 2014’. Notwithstanding the age of this evidence, the factors supporting the range and level of the floorspace thresholds remain relevant, including the relative size of the borough’s centres and the anticipated impact of different scales of development on them. We are therefore satisfied the locally set floorspace thresholds are justified and consistent with national policy, subject to the additional supporting text in **MM062** to explain their rationale to Plan users.
155. **MM061** inserts policy wording in part 2 of the policy to make clear the types of development that will trigger application of the impact assessment floorspace thresholds, such as amalgamation of units or creation of mezzanine floors. This is necessary for effectiveness.
156. As well as floorspace thresholds, part 2 of the policy specifies that, for a retail and/or leisure proposal to undergo an impact assessment, it must be located

within 500 metres (m) of the boundary of Telford town centre or a district centre, or within 500m of a local centre (the boundaries of which are not defined). This part of the policy is problematic for two reasons. Firstly, it exempts proposals beyond 500m of a centre from submitting an impact assessment, which perversely sets a lower policy bar for proposals furthest away from a centre. Secondly, it introduces a tension with the definition of 'edge of centre' in the NPPF glossary, which generally uses a 300m metric and measures distances differently according to use. This introduces ambiguity to the Plan, particularly around application of the nationally prescribed sequential test.

157. Both factors therefore undermine implementation of national town centre first policy. There is scant explanation for this approach in the evidence before us beyond reference to 500m as an easy walking distance, the relevance of which is unclear. We therefore find the distances in part 2 of Policy EC9 unsound because they are unjustified, ineffective and inconsistent with national policy. **MM061** rectifies this by deleting the 500m distances. This MM also modifies the wording in part 3 of the policy to make it consistent with the two-part impact test in NPPF paragraphs 94 and 95.

158. The effectiveness of the town centre first approach also depends on effective monitoring of town centre vitality and viability, and a proportionate and manageable set of relevant indicators should be included in the Plan's monitoring framework. This is addressed under Issue 6 below.

159. Finally, **MM061** adds wording to part 4 of the policy and to the supporting text, to explain that planning permissions for class E uses may be restricted by condition to enable control of non-main town centre uses within that use class. Clarity about this mechanism is necessary for the policy's local application of the national town centre first approach to be effective, although requiring its application in every case would not be consistent with the case-by-case justification required under national policy.

Policy EC11 – Shopfront and advertisement design

160. Part 1d of this policy requires blinds and canopies to be appropriate to the character of the shopfront. To be fully effective, the same requirement needs to be imposed on shutters, as they can also have a deleterious effect on town centre character and vitality if poorly designed. **MM063** makes this modification.

Policy HO3 - Housing mix and quality

161. Policy HO3 sets out that new residential development is required to provide a variety of types, tenures and sizes of houses that reflect local housing need, but to be effective it needs to be clear that it relates to all new major residential development. The evidence supports the policy requirement that new development should meet the internal space standards set out in the Nationally

Described Space Standards. This is justified. However, to be effective this needs to refer to the requirement that it applies to all new residential development.

162. The policy also needs to be amended, for effectiveness, to make it clear the circumstances where alternative forms of amenity space may be allowable in schemes.

163. **MM071** makes these changes and **MM072** and **MM073** make consequential changes to the supporting text for effectiveness.

Policy HO4 - Affordable Housing Requirements

164. This policy sets out the affordable housing requirements that apply to all major residential development and identifies two different requirements, one for the Telford built up area and one for Newport and the rural area. However, based upon the Council's own viability evidence a requirement of 25% affordable housing in the Telford built up area is not justified and the evidence clearly indicates that this should be 20%.

165. It is possible that higher levels of affordable housing could be achieved in both areas if public subsidy was forthcoming for particular schemes and the evidence presented to the examination by the Council suggests that it might. Consequently, a reference to this needs to be added to the policy, to make it clear that the percentage requirements are without public subsidy. A change to the supporting text to the policy is also necessary for effectiveness to provide greater clarification around the use of public subsidy in affordable housing schemes, and we have altered this reference in light of consultation comments made at the modifications stage to recognise that applications for public subsidy cannot be applied for until planning permission has been granted.

166. Also, for effectiveness, policy changes need to be made to include examples of exceptional circumstances where levels below the specified percentages would be considered. This includes a viability assessment at the planning application stage.

167. **MM074** makes the above changes to the policy wording, and **MM075** makes changes to the supporting text in order for the policy as a whole to be justified and effective.

Policy HO5 Affordable housing delivery

168. The policy sets out the different means by which affordable housing could be delivered but to be effective a reference to the objective of seeking provision in

small manageable clusters and to clarify when s106 agreements would be used are both necessary. An erroneous reference to Policy HO5 in section 3 of the policy needs to be altered to Policy HO4. The supporting text to the policy, where it refers to clawback arrangements, needs to be amended so it is consistent with the modified Policy S7.

169. **MM076** and **MM077** make these changes for effectiveness.

Policy HO8 - Gypsy, traveller and showpeople's accommodation

170. The policy details the requirement for gypsy, traveller and showpeople's accommodation will be met in accordance with the need identified in the 'Gypsy and Traveller Accommodation Assessment' (GTAA). In order to meet the identified need for an additional 26 pitches over the plan period, two existing sites will be expanded. These are Lawley Furnaces which could accommodate an additional 3 pitches, and Lodge Road. More up to date evidence indicates that the 17 pitches identified as being feasible on the Lawley Road site should be revised to 'at least 13' and consequently the policy needs to be amended to reflect this in order to be justified and effective. The balance of the identified need for pitches would be met through a positively prepared criteria-based policy approach to proposals for new sites. This combined approach is justified based on the evidence and we are satisfied that despite significant efforts to identify additional sites to allocate to meet that need in full, it has been unable to do so.

171. There is no need to identify any further sites for travelling showpeople in the borough based on the evidence as it is reasonable to assume that the existing site at Hadley can accommodate small additional capacity that could be required during the plan period according to the GTAA.

172. The above necessary changes are made by **MM078** and a number of necessary amendments to the supporting text which would clarify how the policy would operate, are made for effectiveness by **MM079**

Policy HO10 - Stalled development sites

173. This positively worded policy encourages land owners and developers to work with the Council to help progress sites which have stalled. The reference in the policy to the joint production of a "realistic" development brief is unclear and so this word should be deleted for effectiveness. **MM080** makes this change. In addition, it is necessary, for effectiveness, to add a definition of development brief to the Glossary and this is made by **MM143**.

Policy HO11 - Self build and custom housebuilding

174. The policy sets out the Council's approach to supporting self-build and custom build housing as encouraged by the NPPF. On the register held by the Council there are around 200 entries. The general approach is justified but the percentage of self and custom build plots being sought on schemes of over 100 dwellings is too high. A lower figure of 3% is one which can be justified on the evidence of being an appropriate figure to meet the expected need. For effectiveness, there are some changes necessary to those parts of the policy and supporting text which set out how plots are to be marketed.

175. **MM081** and **MM082** make these changes.

Policy HO12 - Housing development in the rural area

176. The policy encourages appropriate new housing development in the rural areas subject to certain criteria, but there are some inconsistencies with other policies including Policy HO11 and Policy HO13 particularly in respect of which rural settlements development proposals would be allowed in. It is also very unclear in some aspects of what would be allowed especially in what would constitute limited development. To be effective therefore a number of amendments are necessary such that the operation of the policy is clear and unambiguous.

177. **MM083** and **MM084** make these necessary changes for effectiveness.

Policy HO13 - Affordable rural exception sites

178. The introduction and supporting text to the policy which sets out how affordable housing schemes in rural areas would be supported as exceptions to normal rural housing needs to be amended to be consistent with the modifications to Policy HO12 and to clarify some aspects of how the exceptions approach would apply. These changes, set out in **MM085** and **MM086**, are necessary for effectiveness.

179. The Plan does not include a list of rural settlements to which the policy would apply and relies upon a list in a separate technical paper which is not part of the Plan. To be effective it is necessary to add such an appendix to the Plan, and this is made through **MM137**.

Policies DD1 and DD2 – Design

180. Policy DD1 sets criteria for achieving high-quality design and Policy DD2 addresses housing development design. There is considerable overlap in the content of the two policies. For example, sections m and o of Policy DD1 deal with aspects of housing design, while section 1j of Policy DD2 addresses safety, which is also covered in DD1. In addition, both policies include requirements that are addressed in other development management policies. Examples

include design for active travel, which is covered in Policy ST4, or carbon reduction and energy efficiency, which are dealt with in Policies CC1 and CC2. Policy DD2 also includes superfluous cross-references to Policy HO4

181. This unnecessary duplication of policy requirements, sometime aggravated by inconsistent wording and/or ill-defined terms, leads to ambiguity and potential confusion for decision makers. This compromises the effectiveness of several policies and should be rectified by streamlining the requirements.
182. **MM087**, **MM088** and **MM089** amend Policy DD1 and its supporting text to include a single set of design criteria applicable to all development proposals, including those for housing. The modifications remove provisions covered elsewhere in the Plan and add text explaining that good design requires application of all relevant Plan policies. They also make clear that additional specific requirements for Sustainable Communities are set out in Policy HO2; and that design briefs will be expected for larger, more complex estate developments, albeit rightly to be considered on a case-by-case basis given that circumstances will vary. Following consultation on the MMs, we have amended **MM088** so that part 1c of Policy DD1 requires respect for “the vision for Telford as a Forest Community”, to be consistent with the MMs to Policy HO2 noted above.
183. Alongside these changes, **MM090**, **MM091** and **MM092** fully delete Policy DD2 and its associated supporting text, including Figure 27. Together, these modifications are necessary for the Plan and its approach to design to be effective.
184. In addition, **MM088** and **MM089** insert policy wording and supporting text in DD1, to reflect the ‘agent of change’ principle in NPPF paragraph 200. A further supporting paragraph makes clear this will apply to development proposals affecting strategic defence facilities, of which there are two in the borough. These modifications are necessary for the Plan to be consistent with national policy, and for the agent of change principle in Policy DD1 to be effective.

Policy ST1 – Sustainable travel

185. Policy ST1 promotes sustainable travel in accordance with the objectives in section 9 of the NPPF and gives due recognition to the area’s extensive network of Public Rights of Way and other local routes. However, the various requirements to be met by major development proposals in part 1 of the policy are preceded by the words “where viable”. This suggests development viability testing would be expected if one or more of the requirements cannot be met. Given these criteria are not necessarily all applicable to every major development proposal, even in urban areas, this circumstance could occur frequently, and PPG on viability discourages such routine viability testing at application stage. “Where viable” should therefore be replaced by “where

appropriate”, for the approach to be justified, effective and consistent with national policy.

186. The word “viable” also occurs in part 1g of the policy and supporting paragraph 11.9, as a test for whether a site can be connected to public transport services. Such connections are more generally impeded by feasibility rather than viability issues, so routine viability testing in these circumstances would also be unjustified. “Viable” should be replaced by “feasible” in both places.

187. For the policy to be effective, the reference to “Dementia friendly design” in part 1c requires clarification through rewording and additional supporting text; and the ambiguous reference to users “accrued” by development in part 1g should be replaced by the more generally understood term “generated” to avoid misinterpretation. In addition, the meaning in part 2 of “development served by one of the borough’s rail and bus stations” is unclear and requires rewording to be effective, along with new supporting text to explain how proximity to a rail and/or bus station will be measured. Finally, Plan users’ attention should be drawn to the Council’s ‘Local Cycling and Walking Infrastructure Plan’ and ‘Bus Service Improvement Plan’, so that their recommendations are considered in development proposals.

188. **MM093** and **MM094** make the changes identified above.

Policy ST3 – Impact of development on highways

189. Policy ST3 is supported by comprehensive borough-wide traffic modelling and identification of key infrastructure interventions to support the growth planned. We are satisfied this evidence is sufficiently up to date to provide a sound and proportionate justification for the policy approach in the Plan, subject to periodic updates to the IDP. As development proposals come forward, the policy is clear there will need to be application-level assessment and mitigation of impacts on highways. However, the word “residual” needs to be inserted in part 1a for the test of cumulative impacts to be consistent with NPPF paragraph 116. In addition, for effectiveness applicants should be advised to have regard to background evidence in the IDP and ‘Telford Growth Strategy’; and that the borough’s road hierarchy is shown on the policies map. **MM095** and **MM096** make these changes, subject to which the policy is sound.

Policy ST4 – Design of roads and streets

190. Policy ST4 requires all development to accord with government guidance on the design of roads and streets, which elevates that guidance to the status of development plan policy without justification. To rectify this, the word “accord” should be replaced by “have regard to”. Additional policy wording also needs to be inserted in part 1f to be consistent with NPPF paragraph 136 and footnote 52, which require planning policies to ensure new streets are tree-lined unless,

in specific cases, there are clear, justifiable and compelling reasons why this would be inappropriate. **MM097** makes these changes. In addition, for effectiveness **MM098** deletes the last sentence of paragraph 11.27 as it includes an incorrect and misleading cross-reference to Policy CI1. However, there is no need to prescribe the detail of tree species or placement in the Plan as those matters are more effectively addressed on a case-by-case basis.

Policy ST5 – Electric vehicle infrastructure and parking design

191. The Council's parking standards are included in a separate guidance document, which does not have development plan status. Therefore, for part 1 of Policy ST5 to be justified, all new development should "have regard" to the standards rather than be expected to meet them. Part 2 needs to be similarly reworded to make clear the Council's guidance on design of electric vehicle charging infrastructure complements rather than replaces Building Regulations standards in this regard. **MM099** makes these changes, subject to which the policy is effective and consistent with national policy.

Policy CI1 – Community facilities

192. The purpose of this policy is to meet community infrastructure needs through protection and enhancement of existing community facilities and/or by securing new provision to meet additional demand arising from development. The scope of facilities covered by the policy is defined in general terms but does not preclude those that are not explicitly listed. This is reasonable as planning judgement will be required about the policy's case-specific relevance.

193. For the loss or reduction of land or buildings currently or last used as a community facility to be supported, part 4 of the policy requires an applicant to demonstrate either a lack of need through marketing evidence or that acceptable alternative provision exists. The policy is not clear how the marketing should take place, so this should be explained in the relevant section of supporting text. Furthermore, there may be circumstances in which loss of an existing community facility is necessary to support implementation of a wider service reconfiguration. This is relevant to public services that operate out of several community buildings in the area, such as the NHS.

194. In such circumstances, assuming an estate reconfiguration strategy or service transformation plan has been agreed, and this justifies the loss of the building or land in question, it would be onerous also to require an applicant to meet one of the other two tests in part 4 of the policy. Therefore, a third test in part 4 is necessary to cover this scenario, with supporting text to recognise the particular circumstances that can affect healthcare infrastructure.

195. **MM100** and **MM101** make these changes and thereby ensure the policy is both effective and positively prepared. **MM101** also adds supporting text to explain

that contributions towards new or expanded community infrastructure, to meet additional need generated by development, will be secured through planning obligations; that the nature and scale of the contributions will be determined having regard to relevant guidance; and that key stakeholders should be engaged in such cases. This is necessary for effectiveness, so Plan users are clear how planning obligations arising from the policy will need to be justified.

Policy CI3 – Provision and management of public open spaces

196. Policy CI3 seeks provision and management of public open spaces to meet need arising from new development, which is consistent with the NPPF's approach to open space for the health and well-being of communities and rightly allows for assessment in the context of local infrastructure. However, the wording in part 3 of the policy about how the need for additional children's play areas will be calculated is ambiguous. It also requires proposals to accord with Council guidance, which elevates that guidance to the status of policy without justification. A modification is therefore necessary to rectify these issues, with consequential amendments to the supporting text to explain that bed spaces will be the metric used.

197. Elsewhere in the supporting text, an additional reference to technical guidance from National Governing Bodies for Sport is necessary for the policy's approach to design of new sport and recreation facilities to be effective. Clarification is also needed to explain when and how appropriate landscape management mechanisms will be discussed with applicants and secured, particularly to assist those submitting outline proposals.

198. **MM102**, **MM103** and **MM104** make these changes for the policy to be effective.

Policy CI4 – Leisure, culture and tourism

199. Policy CI4 supports development for new cultural, tourism and leisure activities and improvements to existing facilities where various tests are met. There is no need to duplicate statutory provision for planning obligations. However, for the policy to be fully effective, additional wording is needed to make clear its provisions cover both indoor and outdoor activities, that the policy support extends to ancillary development associated with such uses, and that glamping is included. In addition, the policy should differentiate its approach between proposals in urban and rural areas. This is necessary to be consistent with NPPF paragraph 88, which requires policies to enable sustainable rural tourism and leisure development that respects the character of the countryside. **MM105** and **MM106** effect these changes in the policy and supporting text.

Policies for the historic environment HE1, HE2, HE4, HE6 and HE7

200. The Plan's suite of historic environment policies is justified by a proportionate evidence base, but their wording and introductory and supporting text are not fully consistent with legislation and/or national policy and guidance relevant to heritage assets. These inconsistencies introduce ambiguity for decision makers and undermine effectiveness.
201. Examples include references to "historic" rather than registered parks and gardens, "local listing" rather than buildings of local interest and not consistently requiring consideration of the setting of heritage assets. Policy HE1 partially misrepresents the process for identifying and considering harm to heritage assets, and its supporting text is not clear enough to be effective on use of heritage assessment and sources of heritage information. There are several incomplete descriptions of statutory provisions and procedures applicable to the World Heritage Site, including in Policy HE2. Policy HE4 requires further explanation about use of conservation area appraisals and management plans for effectiveness. Reference to appropriate mitigation is also missing from Policy HE7 on archaeological remains, which is inconsistent with national policy.
202. **MM107 to MM117** are necessary to rectify these issues and make the historic environment policies consistent with national policy and effective.

Policy ML1 – Mineral safeguarding

203. In accordance with section 17 of the NPPF, Policy ML1 aims to protect mineral resources in the borough and identifies Mineral Safeguarding Areas with buffer zones. Part 1 of the policy sets out circumstances in which exceptions to such protection would apply. This list does not include allocated sites, which creates uncertainty for developers and risks delay in delivery of housing to meet objectively assessed needs over the plan period. This a particular practical concern for the Sustainable Communities sites given their scale and complexity. For the policy to be clear and effective, and to support timely delivery of housing in accordance with national policy and the housing trajectory, an exception for allocated sites should be added, along with supporting text to explain this.
204. The policy nevertheless supports the prior extraction of minerals in other circumstances and where projected housing delivery would not be adversely affected, which is consistent with the encouragement sought in NPPF paragraph 223.
205. Part 6 of the policy is unnecessary because it is not relevant to minerals safeguarding, and part 8 duplicates the requirements in part 7. Parts 6 and 8 should therefore be deleted to remove ambiguity. In part 7, a and b are alternative tests, so should be linked with "or" rather than "and" to be effective. Also, for clarity and effectiveness, the order of parts 4 and 5 should be reversed,

so all the relevant policy provisions precede the list of development types that are exempt from them. Finally, as the buffer zones are shown on an on-line version of the policies map only, this needs to be made clear in supporting text.

206. **MM118** and **MM119** make the above changes for effectiveness and to be consistent with national policy taken as a whole.

Policy ML2 – Maintaining aggregate supplies

207. As required by the NPPF, this policy is supported by a Local Aggregates Assessment prepared jointly with Shropshire Council. However, to be fully justified and effective, and to enable effective monitoring, the data cited in the Plan needs to reflect the most up-to-date evidence. The figures given in the supporting text to Policy ML2 should therefore be taken from the most recent 'Local Aggregates Assessment 2023', rather than its predecessor.
208. The word "only" in part 1 of the policy is restrictive and does not meet the test of being positively prepared, so it should be deleted. The policy reference in part 2 should be to Policy ML3, to reflect the numbering in the Plan rather than its predecessor. There is also a tension between parts 1a and 2, leading to ambiguity for decision-makers. Part 2 requires new aggregate extraction to be consistent with Policy ML3, which includes tests for acceptable environmental impacts. However, part 1a allows for material planning objections arising from Policy ML3 to be outweighed by the need for the mineral. Whilst it is appropriate for harms and benefits to be weighed in the planning balance, the wording of the policy needs to express this more clearly to be effective. Additional supporting text explaining relevant benefits will also assist.
209. **MM120** and **MM121** make the changes identified above, subject to which the policy is positively prepared, justified and effective.

Policy ML3 – Mineral development

210. The environmental impact tests for minerals development in Policy ML3 part 1 broadly reflect those listed as principal issues to be addressed by mineral planning authorities in PPG on minerals. This list is not exhaustive and does not preclude additional factors being included in local plan policies. In the case of Telford and Wrekin, farming, horticulture and forestry are relevant considerations given the nature of the area and its local economy. We are therefore satisfied that criterion 1e in Policy ML3 1e is justified and consistent with national policy and guidance. However, heritage and archaeological assets at criterion 1k should include reference to the assets' setting to be consistent with national policy, and **MM122** inserts this.

Policy ML4 – Land stability

211. For Policy ML4 to be effective, Plan users should understand that it applies where development has potential to lead to land instability issues as well as where they have already been identified; and that the risks of land instability affect property and assets as well as people. Applicants should also be advised to engage with the Canal and River Trust, given that group's local knowledge and the risks potentially associated with land near water bodies in the area. **MM123** and **MM124** add these points to the policy and its introductory text.

212. In addition, **MM138** inserts a plan of the Mining Consideration Area, referred to in part 1 of Policy ML4, in an appendix. The area is not shown on the policies map, so this modification is necessary for effective implementation of the policy.

Policy ML5 – Land contamination

213. National policy on land contamination is clear that mitigation proposals should include land remediation. Although remediation is mentioned in the supporting text to policy ML5, this is not sufficient for it to be effective and fully consistent with NPPF paragraphs 196 and 197. In addition, the supporting text is not entirely clear about circumstances where further site investigations may be required, the competence of the person undertaking them, or the sources of government information and guidance available to applicants. Nor does it clearly state that one of the key purposes of the policy is to protect controlled waters.

214. Consequently, modifications are needed to insert a new clause on remediation into the policy and to address the other points above. **MM125 to MM128** make these changes for effectiveness and consistency with national policy.

Conclusion

215. Subject to the MMs identified above, the development management policies are positively prepared, justified, effective and consistent with national policy.

Issue 6 – Does the Plan have clear and effective mechanisms for monitoring?

216. The Plan does not include a monitoring framework, which undermines its effectiveness. **MM140** inserts a proportionate monitoring framework to satisfy the various monitoring requirements within national policy, underpin mandatory annual Authority Monitoring Reports, and inform Plan reviews. This includes a suite of indicators to measure town centre vitality and viability for effective implementation of national and local town centre first policy. We have amended one of these in response to MM consultation comments, so that it tracks both convenience and comparison retail floorspace.

217. The monitoring framework is to be added as an appendix. **MM129** adds a list of updated appendices for effectiveness.

Glossary

218. It is necessary to make a number of changes to the Glossary, and these are referenced in this report where they relate to the relevant policies. **MM141** is necessary to simply change the reference letter of the Glossary for effectiveness given that the list of appendices is to be updated.

Conclusion

219. Subject to **MM140**, the Plan has clear and effective mechanisms for monitoring.

Overall Conclusion and Recommendation

220. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that we recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explained in the main issues set out above.

221. The Council has requested that we recommend MMs to make the Plan sound and capable of adoption. We conclude that with the recommended main modifications set out in the Appendix the Telford and Wrekin Local Plan Review satisfies the requirements referred to in the Section 20(5)(a) of the 2004 Act and is sound.

Mike Worden and Catherine Carpenter

Inspectors

This report is accompanied by an Appendix containing the Main Modifications.